

March 6, 2023

**Via FedEx and Email**

Attn: Bradley S. Arnold  
[bradley.arnold@sumtercountyfl.gov](mailto:bradley.arnold@sumtercountyfl.gov)  
Sumter County Board of County Commissioners  
7375 Powell Road  
Wildwood, Florida 34785

Re: **Demand for Mediation**  
Project: ITB # 039-0-2021/RS Sumter County Buena Vista Boulevard  
Extension from Meggison Road to SR44

Dear Mr. Arnold:

This firm represents Watson Civil Construction, Inc. ("Watson") in connection with the above-referenced matter. Regarding the parties' continuing disputes in connection with the Project and pursuant to Article 22 of the Project Contract, this letter serves as Watson's written request for mediation. The nature of the disputes and the relief requested has previously been outlined in the claims and the parties' correspondence on these matters, and I understand the parties have had extensive negotiations in an effort to resolve the disputes.

For clarity, the open issues to be mediated include: NOI 1 (wetland clearing claim); NOI 6 (Menard pass-through claim for unforeseen conditions); NOI 8 (traffic control device claim); NOI 13 (RWH pass-through claim due to plan errors); NOI 14 (RWH pass-through claim due to wall construction); claim for grout overrun (as denied by County in writing on September 19, 2022).

Please contact me by close of business on March 10, 2023 to discuss the selection of a mediator. Watson reserves all rights under the Project Contract and applicable law.

Sincerely,



Christian L. Moretz

*Attorneys for Watson Civil Construction, Inc.*